

**IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE
DISTRICT OF TENNESSEE**

Dr. Regina Jordan-Sodiq,
Plaintiff

v.

State of Tennessee et. al.,
Defendants and Fifth Third
Bank,(Defendant)

Case No.: 3:25-cv-00288

Judge Eli Richardson Jury Demand

PLAINTIFF'S MOTION TO COMPEL DISCLOSURE OF HEARING DATE

**AND REQUEST FOR DISCLOSURE OF HEARING DATE & REGISTERED AGENT
INFORMATION**

COMES NOW Plaintiff, Dr. Regina Jordan-Sodiq, and **respectfully moves** this Honorable Court for an order compelling Defendant **Fifth Third Bank National Association** to:

1. **Disclose** the scheduled **hearing date, time, and location** for Defendant's pending Motion to Dismiss.
2. **Provide** the correct **registered agent's full name and address** to facilitate proper service of process.

I. Defendant's Failure to Disclose Hearing Date Impedes Due Process

1. Defendant has filed a Motion to Dismiss but failed to provide Plaintiff with a **scheduled hearing date**, thereby obstructing her ability to prepare an adequate response.
2. **Repeated attempts to obtain this information have been ignored**, preventing Plaintiff from exercising her legal right to defend against Defendant's motion.
3. **Due process requires transparency**, and Defendant's refusal to provide the hearing details violates **procedural fairness** and warrants **judicial intervention**.

II. Defendant's Registered Agent Information is Unclear

1. Plaintiff has attempted **multiple service efforts** via Defendant's registered agent, but service was **rejected due to incomplete or incorrect details**.
2. Defendant must **confirm the correct legal entity name and full registered agent details**, ensuring compliance with **Tennessee Rule 4.04(10)** and other procedural requirements. **Exhibit A:** Wolters Kluwer's "Notice of Rejection Service of Process" -

Log # 548921468 and **Exhibit B:** Wolters Kluwer's "Notice of Rejection Service of Process" -Log # 549867097

3. **Certificate of Service Provided** – Plaintiff references the **Certificate of Service from Katherine R. Rogers, counsel for Fifth Third Bank National Association**, confirming proper service of Defendant's filings via **CM/ECF and first-class U.S. mail on April 21, 2025**.
4. **Defendant's Registered Agent Confusion Obstructs Service:**
 - Defendant's **failure to identify the correct registered agent obstructs proper service** and creates **procedural uncertainty**.
 - Judicial oversight is warranted to **compel disclosure of this essential information**, ensuring Plaintiff's ability to proceed with litigation.

III. Defendant's Motion to Dismiss with Prejudice is Unwarranted

Defendant's attempt to **dismiss Plaintiff's claims with prejudice** lacks legal merit:

1. **Failure to state a claim argument is flawed** – Plaintiff's claims meet **legal standards for harassment and procedural misconduct**, warranting full consideration.
2. **Service of process objections lack grounds** – Defendant's assertion that service was insufficient is **contradicted by Plaintiff's documented attempts and procedural compliance**.
3. **Bad-faith procedural tactics** – Defendant's efforts to **stall litigation through obstruction, withheld information, and tactical delays** warrant judicial scrutiny.
4. If missing exhibits are **deemed essential**, Plaintiff **moves for leave to supplement** any inadvertently omitted documents to ensure **fair consideration and correct any errors**.

IV. Addressing Defendant's Procedural Manipulation

Defendant seeks to limit judicial review by excluding **new factual allegations and exhibits** from consideration. Their key arguments:

1. **Improper introduction of new claims** – Defendant argues Plaintiff **cannot introduce additional factual allegations** in opposition to their Motion to Dismiss.
2. **Exclusion of newly introduced exhibits** – Defendant seeks to bar consideration of exhibits not originally attached, despite their relevance.

Countering Defendant's Arguments

- Plaintiff's allegations support existing legal claims, making them **admissible evidence** rather than improper new claims.
- **Case Law Precedent:** Courts permit **further factual clarification** during opposition motions, negating Defendant's exclusion attempt.
- If certain exhibits were omitted, Plaintiff **moves for leave to supplement**, ensuring procedural fairness.
- Defendant's efforts to block evidence highlight **systematic procedural obstruction**, reinforcing the necessity of **judicial oversight**.

V. Relief Requested

WHEREFORE, Plaintiff respectfully requests this Honorable Court to:

- **Compel Defendant to disclose the hearing date, time, and location** for its pending Motion to Dismiss.
- **Require Defendant to confirm its registered agent's full name and address**, ensuring proper service.
- **Permit Plaintiff to supplement missing exhibits if deemed necessary for judicial review.**

Grant any further relief deemed just and equitable to prevent procedural obstruction

CERTIFICATE OF SERVICE

I hereby certify that on this **5th day of May, 2025**, a true and correct copy of **Plaintiff's Response in Opposition to Defendants' Motion to Dismiss and Motion to Compel Disclosure of Hearing Date and Registered Agent Information**, along with accompanying exhibits, was served via **electronic filing** upon the following:

Defendants' Counsel: Katherine R. Rogers, Burr & Forman, LLP; email: krogers@burr.com

Pursuant to the Tennessee Rules of Civil Procedure, electronic service of this filing is deemed proper and effective.

Submitted this 5th day of May, 2025

Dr. Regina Jordan-Sodiq, Pro Se Plaintiff

1757 Autumnwood Blvd Clarksville, TN 37042

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

REGINA Jordan-Sooty
Plaintiff(s),

v.

State of Tennessee et al.,
Defendant(s). and Fifth Third
Banks Defendants

Case Number Case No: 3:25-CV
00288

Judge Judge Eli Richardson

Magistrate Judge Surry Demand

Response to Motion to Dismiss
(Type of Pleading)

- ① Exhibit A: Walters Klower's "Notice of Rejection Service of Process" - Log #548921468 and
- ② Exhibit B: Walters Klower's "Notice of Rejection Service of Process" - Log # ~~54892~~
549867097

①

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)

Response to Motion to Dismiss

(Name)
(Address)
(Address)

Kimberly S. Seirs
214 Church Street
Suite 200, Nashville TN 37203

(Name)
(Address)
(Address)

Katherine R. Rogers
222 Second Ave South, Suite 2000
Nashville TN 37201

(Name)
(Address)
(Address)

Stanley Mitchell Moss
209 1/2 2nd St
Clarksville TN 37040

(Name)
(Address)
(Address)

Jason W. Dillon
701 Gates LLP
201 Commerce Street
Suite 1500, Nashville TN 37203

(Name)
(Address)
(Address)

Tracey P. Knight
208 1/2 2nd Street
Clarksville TN 37040

(Name)
(Address)
(Address)

Dr. Christopher Manning
Buller School Bldg
1320 Adams St, Suite 1400
Nashville TN 37208

(Name)
(Address)
(Address)

Kirrah Anderson (Nelson)
600 Peachtree Street, NE, Suite 300
Atlanta GA 30308

(Name)
(Address)
(Address)

John H. Dellerhede
Daries Snow LLC
1500 2nd Avenue South Suite 1600
Nashville TN 37201

(Name)
(Address)
(Address)

Colie William Schott
3100 West End Ave Suite 1100
Nashville TN 37203

on the day of

24

Continue -

Signature

2

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the (pleading)
has been served on:

Response Motion to Dismiss

(Name)

IN. Scott Sims

(Address)

3102 West End Avenue, Suite 1100

(Address)

Washville TN 37203

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

(Name)

(Address)

(Address)

5th day of *May*

2025
DR
Signature
3

Rebecca Jordan-Silva
Rebecca Jordan-Silva

1757 Ashbourne Blvd
Charlotte, TN 37042

(931) 561-2546
Business & Telephone Numbers, if any

4

Exhibit - A

April 18, 2025

Notice of Rejected Service of Process – Log# 548921468

Agent Served: C T Corporation

Party Served: Fifth Third Bank

Jurisdiction Served: Tennessee

Date of Service: April 17, 2025

Title of Action: Dr. Regina Jordan-Sodiq, Pro vs. Fifth Third Bank

Case No. 325CV00288

Dear Sir/Madam:

We have received documents from you in the above-referenced matter, but we are not able to forward the documents to any party due to the reason indicated below.

☒ Not Agent: According to our records and/or the records of the Secretary of State, we are not the registered agent for the party you are attempting to serve.

☐ Documents Do Not Correctly Identify the Intended Recipient: The name of the party that you are trying to serve appears to be incomplete and/or there are other errors in how you have identified the party that you are trying to serve. Our company is the registered agent for service of process for hundreds of thousands of entities, and because of your errors in identifying the party that you are trying to serve, we are unable to determine the identity of the party that you are attempting to serve.

☐ Inactive Entity: The entity that you are attempting to serve is either discontinued on our records and/or inactive with the Secretary of State. Accordingly, we no longer have any active agreement with the entity to operate as its registered agent for service of process, and we no longer have current delivery instructions on file.

To be clear, for the aforementioned reason(s), we have not been able to forward the documents that you are attempting to serve to any party. We are writing this letter to you so that you can take action to address the problems that we have identified. If you do not correct the errors identified herein, the party you are trying to serve will not receive notice of these documents.

Please email SOPInquiries@wolterskluwer.com if you believe that you have received this letter in error or if you need further assistance.

(Returned To)

DR. REGINA JORDAN-SODIQ

1757 Autumnwood Blvd,
Clarksville, TN 37042



April 24, 2025

Notice of Rejected Service of Process – Log# 548967097

Exhibit-B

Agent Served: CT Corporation
Party Served: Fifth Third Bank
Jurisdiction Served: Tennessee
Date of Service: April 23, 2025
Title of Action: Dr. Regina Jordan-Sodiq vs. State of Tennessee
Case No. 325CV00288

Dear Sir/Madam:

We have received documents from you in the above-referenced matter, but we are not able to forward the documents to any party due to the reason indicated below.

☒ Not Agent: According to our records and/or the records of the Secretary of State, we are not the registered agent for the party you are attempting to serve.

☐ Documents Do Not Correctly Identify the Intended Recipient: The name of the party that you are trying to serve appears to be incomplete and/or there are other errors in how you have identified the party that you are trying to serve. Our company is the registered agent for service of process for hundreds of thousands of entities, and because of your errors in identifying the party that you are trying to serve, we are unable to determine the identity of the party that you are attempting to serve.

☐ Inactive Entity: The entity that you are attempting to serve is either discontinued on our records and/or inactive with the Secretary of State. Accordingly, we no longer have any active agreement with the entity to operate as its registered agent for service of process, and we no longer have current delivery instructions on file.

To be clear, for the aforementioned reason(s), we have not been able to forward the documents that you are attempting to serve to any party. We are writing this letter to you so that you can take action to address the problems that we have identified. If you do not correct the errors identified herein, the party you are trying to serve will not receive notice of these documents.

Please email SOPInquiries@wolterskluwer.com if you believe that you have received this letter in error or if you need further assistance.

(Returned To)

Dr. Regina Jordan-Sodiq
1757 Autumnwood Blvd.,
Clarksville, TN 37042